

EXHIBIT 1 TO STIPULATION OF DISMISSAL

Matthew Bissonnette is a former Navy SEAL who served 13 consecutive combat deployments. Alongside his fellow SEALs, he participated in the mission resulting in the rescue of Captain Richard Phillips from Somali pirates in 2009, and the mission resulting in the death of Osama Bin Laden in 2011.

After observing that these missions-particularly the Bin Laden mission- were being written about inaccurately, by people who failed to highlight the skill and sacrifice of the SEALs, Mr. Bissonnette decided to write his own book. He did not seek personal recognition or wealth from the book. He used a pseudonym to remain anonymous and he dedicated the proceeds from the book to charities that care for the families of fallen SEALs.

In his search for legal representation to ensure he complied with his obligations of confidentiality, Mr. Bissonnette was referred to Mr. Podlaski who had advised another ex-military author on such issues. Mr. Podlaski is a former Jag Corp officer who had experience in dealing with military confidentiality, military law, and Special Operations issues.

Carson Boxberger, LLP and Kevin Podlaski were honored to represent Mr. Bissonnette and advised him on the legal issues related to his book No Easy Day. In reliance on their professional advice, Mr. Bissonnette did not submit No Easy Day to the Government before publication. The Government contended that a pre- publication review was required and caused Mr. Bissonnette to forfeit to the Government all the money set aside for the SEAL charities.

Mr. Bissonnette has acknowledged his responsibility for publishing the book without a review by the Government. Carson Boxberger and Kevin Podlaski acknowledge their role in that decision and support Mr. Bissonnette's efforts to correct the consequences of this unfortunate situation.

Matthew Bissonnette, Carson Boxberger and Kevin Podlaski are anxious to put this matter to rest and Carson Boxberger and Kevin Podlaski wish Mr. Bissonnette much success in his future endeavors. The parties will not comment further on the terms of their settlement.